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**MAY 27 1993**

DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In The Matter of )  
Replacement of Part 90 )  
By Part 88 to Revise )  
The Private Land Mobile )  
Radio Services and Modify )  
The Policies Governing Them )

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**MAY 27 1993**

**FCC MAIL BRANCH**

PR Docket 92-235

TO: THE FEDERAL COMMUNICATIONS COMMISSION:

The International Association of Chiefs of Police (IACP), on behalf of Law Enforcement Officers throughout the United States, expresses its support for the Commission's intent to provide more capacity for Private Land Mobile and in particular Public Safety.

We are keenly aware of the shortages of spectrum that exist especially in the Metropolitan Areas, and the need to maximize spectrum efficiency where possible. While our primary communications goal is to support all positive efforts to provide additional radio spectrum for police and local governments, the proposed rule change, as written, imposes a significant financial burden on all police agencies and State and Local radio users in the effected bands.

We believe that a better approach for migration to narrower channels would be for the Commission to provide sufficient time (10 years minimum) for transition, thus minimizing the severe financial impact of the proposed conversion, the normal replacement and upgrade cycle could then accommodate the expense, without placing additional requirements on already limited State and Local financing.

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As a matter of particular concern and consistent with our spectrum shortage interests, IACP points out the proposed loss of spectrum to the public safety services in the VHF band through the proposed inclusion of the innovator shared use operation. This is unacceptable to police and local government users since the vast majority of our police departments and local government agencies across the nation operate in the VHF band. Our need is for additional radio spectrum in VHF, not to reduce the amount of spectrum available to public safety.

The Commission's band splitting proposal is consistent with the requirements of increasing the amount of spectrum available to police and local government. The move to 12.5 KHz as a standard channel band width for all PLMR services is endorsed by IACP. This proposal is consistent with the extensive work being done by Associated Public Safety Communications Officers Inc. (APCO), the National Association of State Telecommunication Directors (NASTD) and Federal Government Agencies (FBI, CUSTOMS, DEA, etc.) under the auspices of APCO-25. Additionally, very narrow channel bandwidths (5KHz) as proposed in the NPRM (Docket 92-235) for the 150-160 MHz band have not yet been sufficiently tested, particularly in the crowded public safety environment. IACP cannot endorse compromising operational reliability and flexibility merely to increase the channel count in the FCC rules, however, technological advancements on the horizons are moving rapidly and technology should be reviewed with a further proceeding 5 years out.

We agree with the 12.5 KHz channel bandwidth plan as it will produce interoperability with Federal Government Law Enforcement, and provide a known quality of proven service for law enforcement. IACP takes exception to any further bandwidth reductions before the 2-Way Communication industry can demonstrate assurances that such further reduction will perform in the real world at comparable levels to today's 25 KHz equipment. We concur with APCO's recommendation to revisit technology and proposed reduction to 6.25 KHz after the Report and Order is adopted.

The proposed time schedule to implement the band split requirement must take into consideration the economic factors that are a real and major concern for State and Local government and yet must consider the immediate needs of spectrum for major metropolitan areas. The implementation schedule must be sooner for the Metropolitan areas than the rest of the nation. It would not be unreasonable, to require 12.5 KHz as the standard for all new systems, one year after adoption of the Report & Order. A mandated move to a 12.5 KHz standard nine (9) years later will provide adequate time for retirement of existing equipment.

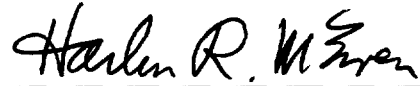
The NPRM proposes a reduction in transmitter power relative to overall antenna height based on a graduated table. Police and local government radio communications systems are designed for the most part to provide the highest level of coverage throughout their service area. Reducing transmitter power as proposed will cause a drastic reduction of coverage in the service area and in most cases will endanger the lives of police and other Public Safety employees. Understandably, power, antenna height and terrain provide an important aspect to frequency reuse. However, if restrictions are applied to each individual system design (e.g., reasonable power and antenna design to limit coverage to the service area), the Commission's goals will still be met. Such restrictions as proposed in the NPRM will require additional sites, necessitating more frequencies and causing financial hardship to police and local governments. These proposed changes have the potential of causing life-threatening safety problems for public safety due to reduced radio coverage, and therefore, should be abandoned.

#### SUMMARY:

The IACP membership, of over 14,000 professionals dedicated to enhancing the art and science of law enforcement, views this proposed rule change as rule making coming from the Commission that will influence the future of Police and Local government communications for many years to come. The International Association of Chiefs of Police supports the Commission's goal to improve spectrum efficiency. However, spectrum efficiency must be addressed carefully and practically. The Public Safety community cannot endorse regulations built around unproven technology. In making these decisions, the Commission must consider the impact on our budgets. Retiring our systems prematurely or redesigning our systems to comply with proposed power reductions must be done without reducing or compromising our operational effectiveness.

Law Enforcement has unique needs requiring the use of proven communication technologies. We cannot abandon our existing structure until we can be assured that these needs can be met at a level which does not compromise existing quality and eliminate current equipment features at comparable costs. In addition, we believe that with the increase in the demand for more information at the "street level" the requirement for more spectrum with broader bandwidths to accommodate these demands will continue. We therefore suggest requiring land mobile users to employ 5 KHz and 6.25 KHz equipment is premature. While 12.5 KHz can be implemented now, further mandated reductions in channel widths should await a subsequent review of technology at least five years out.

Respectfully submitted by the Chairman,  
IACP Communications Committee



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